

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

FTX TRADING, LTD., *et al.*,¹

Case No. 22-11068 (JTD)

Debtors.

(Jointly Administered)

**VERIFIED STATEMENT PURSUANT TO RULE 2019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

The law firm of McCarter & English, LLP (“McCarter”) respectfully submits this *Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure* (the “Statement”) pursuant to the provisions of Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in connection with its representation of Sunil Kavuri, Ahmed Abd-El-Razek and Pat Rabitte (collectively, the “Customers”), who hold accounts on the FTX.com platform, and respectfully state as follows:

1. On or about January 9, 2024, the Customers retained McCarter to represent them in connection with the Debtors’ above-captioned Chapter 11 cases (collectively, the “Cases”). Attached hereto as **Exhibit A** is a list of the names and addresses of each Customer and each Customer’s disclosable economic interests held in relation to the Debtors as of November 11, 2022 in accordance with Bankruptcy Rule 2019. The information set forth on **Exhibit A** is based upon information provided to McCarter by the Customers and is subject to change.

2. The information in **Exhibit A** is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose, including, without limitation, any restrictions

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases (collectively, the “Debtors”), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

or limitations on the rights and abilities or arguments of the Customers to assert their claims against the Debtors, recover their property held by the Debtors (or any third parties) or otherwise exercise their rights or remedies with respect to the Debtors. Moreover, given the Customers' limited access to the FTX.com platform, the information provided is based on the best available records and is subject to change. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims and reserves all rights with respect thereto. Counsel does not own, nor has it ever owned, any claims against or interests in the Debtors, except for the claims for services rendered by the Customers.

3. Nothing contained in this Statement (or **Exhibit A** hereto) should be construed as a limitation, restriction or waiver of any rights, abilities or arguments of any Customer, its respective affiliates, or any other entity, or an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation, restriction or waiver of, any rights of the Customers to assert, file and/or amend their claims against the Debtors, in accordance with applicable law and any orders entered in these cases.

4. Each Customer has consented to McCarter's representation of the Customers and has executed an engagement letter expressly consenting to such group representation. McCarter does not represent any of the Customers in their individual capacity or with respect to any property interests or related claims other than in connection with their status as a customer and creditor of the Debtors.

5. Moreover, McCarter has been contacted by more than 1,500 additional individuals and entities to represent their interests as former customers of the FTX.com exchange. A list quantifying the dollar equivalent of the claims of each of these customers is attached hereto as **Exhibit B**. McCarter has not been retained to represent these customers yet, but they or other

additional customers may also seek to retain McCarter in these Cases, and McCarter will file additional Statements, as necessary, to comply with Bankruptcy Rule 2019. Pursuant to Rule 2019, such additional statements will disclose the identity and economic interest of each customer.

6. McCarter expressly reserves the right to amend or supplement this Statement, as necessary, for any reason in accordance with Bankruptcy Rule 2019.

7. The undersigned verifies under penalty of perjury that the foregoing statements are true and correct to the best of her knowledge, information and belief.

MCCARTER & ENGLISH, LLP

Date: June 24, 2024

/s/ Shannon D. Humiston
Shannon D. Humiston (No. 5740)
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, Delaware 19801
Tel: 302-984-6300
Fax: 302-984-6399
shumiston@mccarter.com

- and -

David Adler, Esq.
Worldwide Plaza
825 Eighth Ave., 31st Floor
New York, NY 10019
Phone: (212) 609-6847
Fax : (212) 609-6921
Email: dadler@mccarter.com

Counsel for Sunil Kavuri, Ahmed Abd-El-Razek and Pat Rabitte